

# ***Exhibit 3***

-----x

V.

19 Cr. 789 (PGG)

Plea

Defendant.

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New York, N.Y.  
October 12, 2021  
10:00 a.m.

HON. SARAH NETBURN,

Magistrate Judge

## DAMIAN WILLIAMS

LOUIS PELLEGRINO

Assistant United States Attorney

KENNETH J. MONTGOMERY

Attorney for Defendant

with Rose and others. He also recruited attorneys and clinics to participate in the scheme.

THE DEFENDANT: Yes.

Do you acknowledge and accept those statements as true?

THE COURT: Paragraph 4: Rose and Wray further received kickbacks for steering victims to a particular MRI facility. From at least in or about 2016 up to and including November 2019, a coconspirator (CC-1) agreed to pay Rose and Wray to send motor vehicle accident victims to a particular MRI facility located in Howard Beach, New York (MRI facility-1). CC-1 agreed to pay approximately \$150 per patient. Wray provided patients using Rose's call center and by bribing clinic managers to send patients to MRI facility-1. CC-1 was

LACGwrap

1 aware that Wray was paying bribes.

2 Do you acknowledge and accept as true the statements  
3 in paragraph 4?

4 THE DEFENDANT: Yes.

5 THE COURT: Paragraph 5: In addition, in or about  
6 2017, Rose, Wray, a paralegal (Paralegal-1) and a physician  
7 (Physician-1) agreed to open a medical clinic in the Bronx  
8 (Clinic-1). Wray funded Clinic-1 and exercised substantial  
9 control over its operation. Among other things, Wray hired and  
10 fired numerous medical personnel (including acupuncturists and  
11 chiropractors) and required these persons to pay kickbacks for  
12 patients. Wray also required the clinic, (a), to use his  
13 company to provide durable medical equipment to patients, (b),  
14 to send patients to a particular MRI facility located in New  
15 Jersey (MRI facility-2), and a particular surgical center  
16 located in New Jersey (Surgical center-1), and (c) to use  
17 particular pharmacies to supply prescriptions to patients.  
18 Wray received kickbacks for these referrals. Wray split  
19 several of these kickbacks with Paralegal-1. Wray sold  
20 Clinic-1 in 2019 to start another clinic with Physician-1.

21 Sir, do you acknowledge and accept as true the  
22 statements in paragraph 5?

23 THE DEFENDANT: Yes.

24 THE COURT: Paragraph 6: Following his arrest in  
25 November 2019, Wray destroyed his burner phones and deleted all

